

## SAT Report

PMN Number: P-14-0534

SAT Date: 5/9/2014

Print Date: 11/26/2014

### Related cases:

### Concern levels:

Type of Concern:	<u>Health</u>	<u>Eco</u>	<u>Comments</u>
Level of Concern:	1-2	3	

<u>Persistence</u>	<u>Bioaccum</u>	<u>Toxicity</u>	<u>Comments</u>
2	1	1	
		Awaiting	
		Human Health	
		Entry	
		Awaiting	
		Human Health	
		Entry	
		Awaiting	
		Human Health	
		Entry	

### Exposure Based Review:

**Health:** No

**Ecotox:** Yes

### Routes of exposure:

**Health:** Dermal Inhalation

**Ecotox:** All releases to water

**Fate:** ;

### Keywords:

Keywords:

### Summary of Assessment:

#### Fate:

**Fate Summary:** P-14-0534

FATE: Estimations for typical cation, [REDACTED]

log Kow = 2.66 (E)

log Koc = 4.49 (E)

log Fish BCF = 1.85 (E)

log Fish BAF = 0.93 (E)

PMN Substance: Liquid with MP = -4 C (M)

S = Dispersible

VP < 1.0E-6 torr at 25 C (E)

BP > 400 C (E)

H < 1.00E-8 (E)

POTW removal (%) = 90 via sorption; OECD 306(Closed Btl; seawater): 21%/28d.

Time for complete ultimate aerobic biodeg = wk

Sorption to soils/sediments = strong

PBT Potential: P2B1

\*CEB FATE: Migration to ground water = negl - slow

### Health:

**Health Summary:** Not absorbed from the skin, for the low molecular weight fractions [REDACTED] expect poor absorption from the GI tract and moderate absorption from the lung (pchem). Concern for [REDACTED] effects on the lung; irritation to eye, mucous membranes and lung based on [REDACTED] properties of the compounds.

### Ecotox:

Test Organism	Test Type	Test End Point	Predicted	Measured	Comments
fish	96-h	LC50	49		
daphnid	48-h	LC50	0.13		
green algal	96-h	EC50	0.68	0.23	
fish	—	chronic value	0.013		
daphnid	—	chronic value	0.068		
algal	—	chronic value	0.45	0.18	
Sewage Sludge	3-h	EC50	—		
Sewage Sludge	—	Chronic Value	—		

### **Ecotox Values Comments:**

Factors	Values	Comments
Assessment Factor	10	
Concentration of Concern (ppb)	1	
SARs	[REDACTED]	
SAR Class	[REDACTED]	
Ecotox Category		

### **Ecotox Factors Comments:**

**SAT Chair:** L Keifer 564-8916

**Focus Report**  
**New Chemicals Program**  
PMN Number: **P-14-0534**

Focus Date: 05/19/2014 Report Status: Completed  
Consolidated Set:  
Focus Chair: Kristan Markey Contractor: Olga Svetlitskaya

**I. Notice Information**

Submitter: [REDACTED] CAS Number: [REDACTED]  
Chemical Name: [REDACTED]

Use: The PMN substance will be used in the oil and gas industry as a corrosion inhibitor additive to prevent internal corrosion in pipelines, pools, process equipment, and vessels. The PMN substance is intended for use in applications involving sour gas streams which have high levels of hydrogen sulfide. STN file CA: no references found.

Other Uses: [REDACTED]

PV-Max: [REDACTED]  
Manufacture: Import: X

**II. SAT Results**

(1) **Health Rating:** 1-2 **Eco Rating:** 3 **Comments:** ;

**Occupational:** 1C **Non-Occupational:** 1 **Environmental:** 1

(1) **PBT:** 2 1 1 **Comments:**

**III. OTHER FACTORS**

**Categories:**

Health Chemical Category: Ecotox Category: [REDACTED]

**Related Cases/Regulatory History:**

Health related Cases:

Ecotox Related Cases: Analogs: [REDACTED]

Regulatory History: [REDACTED]  
- DENIED  
- GRANTED  
- WITHDRAWN - OTHER  
- FOCUS DROP  
- SR MID-COURSE DISP DROP

**MSDS/Label Information:**

MSDS: Yes Label: No  
General Equipment: for long term exposure: fluorinated rubber gloves (480 min breakthrough, 0.7 mm thickness); for short-term exposure: nitrile rubber gloves (30 min breakthrough, 0.4 mm thickness). / wear sufficient eye protection (safety glasses with side protection or goggles, and if necessary, face shield) / protective clothing.  
Respirator: Use respiratory protection in case of insufficient exhaust ventilation or prolonged exposure.  
Health Effects: Harmful if swallowed / causes skin irritation / causes serious eye damage.  
TLV/PEL (PMN or raw material): - none established.

**Exposure Based Information:**

Exposure Based Review:	Y	Exposure Based Review (Health):	N
Exposure Based Review (Eco):	Y	Exposure Based (Occupational):	No
Exposure Based Review (Non Occupational):	N	Exposure Based (Environmental):	

Exposure Parameter	Exposure-Based	Persistent/Bioaccum	Exposure Value
Surface DW:		Yes	
Fish Ingestion:			
Ground DW:			
Inhalation:			
Water Releases:			
Total Releases:	Yes		
Consumer Exposure:	Yes		

#### **IV. Summary of SAT Assessment**

##### **Fate:**

###### **Fate Summary:**

P-14-0534  
 FATE:   
 log Kow = 2.66 (E)  
 log Koc = 4.49 (E)  
 log Fish BCF = 1.85 (E)  
 log Fish BAF = 0.93 (E)  
 PMN Substance: Liquid with MP = -4 C (M)  
 S = Dispersible  
 VP < 1.0E-6 torr at 25 C (E)  
 BP > 400 C (E)  
 H < 1.00E-8 (E)  
 POTW removal (%) = 90 via sorption; OECD 306(Closed Btl; seawater): 21%/28d.  
 Time for complete ultimate aerobic biodeg = wk  
 Sorption to soils/sediments = strong  
 PBT Potential: P2B1  
 \*CEB FATE: Migration to ground water = negl - slow

##### **Health:**

###### **Health Summary:**

Not absorbed from the skin, for the low molecular weight fractions   
 expect poor absorption from the GI tract and moderate absorption from the lung (pchem). Concern  
 for effects on the lung; irritation to eye, mucous membranes and lung based on  
 properties of the compounds.

##### **Ecotox:**

###### **Ecotox Values:**

Fish 96-h LC50:	49(P)	
Daphnid 48-h LC50:	0.13(P)	
Green algal 96-h EC50:	0.68(P)	0.23(M)
Fish Chronic Value:	0.013(P)	
Daphnid ChV:	0.068(P)	
Algal ChV:	0.45(P)	0.18(M)

**Ecotox values comments:** Predictions are based on SAR-nearest analog method for   
 liquid with mp -4; S  
 = dispersible at 25 C (P); pH7; effective concentrations based on 100% active ingredients and  
 mean measured concentrations; hardness <150.0 mg/L as CaCO3; and TOC <2.0 mg/L;

Ecotoxicity Test Data Results for P-14-0534:

A marine algal toxicity test was conducted in 2012-2013 on the precursor of P-14-0534. This is an acceptable analog according to Kathy Schechter for P-14-0534. The tested material was labeled   
 The PMN material (P-14-0534) is estimated to be dispersible in water with an estimated vapor pressure of < 1E-6 mm Hg at 25 °C. The sorption to soils and sediments is estimated to be strong and the time to complete ultimate aerobic biodegradation is estimated to be weeks. The testing laboratory noted that the analog was soluble in salt water. The ecotoxicity study is reviewed below.

#### Algal Ecotoxicity Test:

Opus conducted a 72-hour growth inhibition test in marine unicellular algae (*Skeletonema costatum*) with P-14-0534 (purity not provided) under static conditions. This study was reported to be in accordance with SOP 104 and ISO 10253 (2006), "Water Quality – marine algal growth inhibition test," and ISO 5667-16 (2006) "Water quality-sampling – guidance on biotesting of samples." Following a preliminary range-finding study, three replicates of *S. costatum* (9,843 cells/mL) were exposed to test substance at nominal concentrations of 0.10, 0.32, 1.0, 3.2, 10, 32 and 100 mg/L. Additionally, six replicates of a control group (ISO culture medium) were tested concurrently. The algae were illuminated at a light intensity within the range of 6360-8890 lux with constant shaking. The test substance was considered soluble and a 100 mg/L stock solution was prepared. Appropriate volumes were taken from the stock solution to prepare subsequent test concentrations which were brought to volume with culture medium. Over the course of the study, temperature incubation ranged from 20.9-21.9°C and pH ranged from 8.01-8.47. Prior to testing, the salinity of ISO culture media was 36 ppt. The control growth rate was 1.29/d. Based on nominal concentrations, the 72-hour EC50 for growth inhibition is 0.23 mg/L. The 72-hour NOEC and LOEC are 0.10 and 0.32 mg/L, respectively. The 72-hour ChV (GMATC of the NOEC and LOEC) is 0.179 mg/L.

72-hour EC50 (growth inhibition) = 0.23 mg/L

72-hour NOEC = 0.10 mg/L

72-hour LOEC = 0.32 mg/L

72-hour ChV = 0.18 mg/L

#### Conclusions:

The 72-hour algal toxicity test was acceptable for the purposes of concentration of concern determination within OPPT. For comparative purposes, the acute fish (96-hr LC50), acute daphnia (48-hr EC50), and algal (96-hr EC50) toxicity values, based on SARs for P-14-0534, are 49 mg/L, 0.13 mg/L, and 0.68 mg/L, respectively. In addition, based on the same SAR equations, the fish, daphnia, and algal chronic values for P-14-0534 are 0.013 mg/L, 0.068 mg/L, and 0.45 mg/L, respectively. The acute concentration of concern (CoC) for P-14-0534 is calculated by dividing the 48-hr aquatic invertebrate toxicity value (0.13 mg/L) by an uncertainty factor of 5 yielding 26 ppb (130 µg/L / 5). The chronic CoC for P-14-0534 is calculated by dividing the fish chronic value (13 µg/L) by an uncertainty factor of 10 yielding 1 µg/L or 1 ppb.

The acute CoC = 26 ppb

The chronic CoC = 1 ppb

Ecotox Study Reviewer: J. Gallagher

May 14, 2014

#### Ecotox Factors:

Assessment Factor: 10

Concern Concentration: 1

## **V. Summary of Exposures/Releases**

Engineering Summary: P-14-0534

<b>Exposures/Releases</b>	<b>Release</b>	<b>Release</b>	<b>Release</b>
<b>Scenario</b>			
<b>Sites</b>			
<b>Media</b>			
Descriptor A	Output 2	Conservative	Output 2
Quantity A (kg/site/day)			
Frequency A (day/year)			
Descriptor B			
Quantity B (kg/site/day)			
Frequency B (day/year)			
From			
Workers			
Exposure Type			

<b>Engineering Summary: Exposures/Releases</b>	<b>Release</b>	<b>Release</b>	<b>Release</b>
<b>Scenario</b>			
<b>Sites</b>			
<b>Media</b>			
Descriptor A	Output 2	Output 2	Output 2
Quantity A (kg/site/day)			
Frequency A (day/year)			
Descriptor B			
Quantity B (kg/site/day)			
Frequency B (day/year)			
From			
Workers			
Exposure Type			

## **V. Summary of Exposures/Releases**

Engineering Summary: P-14-0534

<b>Exposures/Releases</b>	<b>Release</b>	<b>Exposure</b>	<b>Exposure</b>
<b>Scenario</b>			
<b>Sites</b>			
<b>Media</b>			
Descriptor A	High End	High End	High End
Quantity A (kg/site/day)			
Frequency A (day/year)			
Descriptor B			
Quantity B (kg/site/day)			
Frequency B (day/year)			
From			
Workers			
Exposure Type			



## **VI. Focus Decision and Rationale**

### **Regulatory Actions**

Regulatory Decision: PMN Ban Pending Upfront Testing

Decision Date: 05/19/2014

Type of Decision:

Rationale:

P-14-0534 will be regulated under the TSCA 5(e) category [REDACTED] [REDACTED] ) Ban Pending-Up Front Testing under the risk and exposure-based authority for ecotoxicity and fate concerns. Not absorbed from the skin, for the low molecular weight fractions [REDACTED] expect poor absorption from the GI tract and moderate absorption from the lung (pchem). Human health hazard concerns were low-moderate for [REDACTED] effects on the lung; irritation to eye, mucous membranes and lung based on [REDACTED] properties of the compounds. Workers are expected to be exposed via the dermal and inhalation routes. Potential risks to workers were mitigated by negligible inhalation exposures and appropriate dermal PPE. The engineer recommended amending the SDS to include a NIOSH-certified respirator, however due to negligible inhalation exposures the change was not required. Ecotoxicity hazard concerns were high based on SAR nearest analog predictions for [REDACTED]. Chronic risks to the environment were high due to releases to water where the chronic COC of 1 ppb was exceeded 50 [REDACTED] days [REDACTED] and 250 [REDACTED] days [REDACTED] during processing and use operations. Acute risks to the environment were high due to releases to water where the SWCs of [REDACTED] and [REDACTED] during processing and use operations exceeded the acute COC of 26 ppb. The acute and chronic mixing zone concentrations of [REDACTED], respectively, also exceeded the concern concentrations. The program manager will clarify with the submitter if this PMN will be used in marine water, freshwater or both. The testing will be finalized once the clarification is made. The required ecotoxicity testing for marine water use will be the Fish acute toxicity test, freshwater and marine test (OPPTS Test Guideline 850.1075), and the Mysid acute toxicity test (OPPTS Test Guideline 850.1035). If the PMN is used in both marine and freshwater the required ecotoxicity testing will be the acute base set: Freshwater daphnids (OPPTS Test Guideline 850.1010), Fish acute toxicity test (OPPTS Test Guideline 850.1075), and the Algal toxicity test (OCSPP Test Guideline 850.4500), as well as the Fish acute toxicity test, freshwater and marine test (OPPTS Test Guideline 850.1075) and the Mysid acute toxicity test (OPPTS Test Guideline 850.1035). The fate testing is to be determined. No human health testing was desired. [REDACTED]

COC: Chronic – 1 ppb, Acute – 26 ppb

Summary of Exposures and Releases

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

P2 Rec Comments:  
**Testing:**

**Final Recommended:**  
Health:  
Eco:  
Fate:  
Other:

# Briefing Paper

Case Number: P-14-0534

## Part I: Background Data

---

Program Manager: Kristan Markey

Technical Integrator:

Review Team:

Meeting Date:

Day In Process: 91

Day 90: 11/28/2014

A. CBI Claims: Everything except specific use

B. Submitter:

C. Chemical Identity:

D. Chemical Class:

Ecotox:

E. Structure:

F. Physical/Chemical properties:

VP: Measured Torr @ 25 C

Est. <0.000001 Torr @ 25 C

s-H<sub>2</sub>O: Measured g/L

Phys State: Neat: Liquid

Manufacturing: NK, imported

Process/Form:

End Use:

G. Volume:

kg/yr

H. Use:

The PMN substance will be used in the oil and gas industry as a corrosion inhibitor additive to prevent internal corrosion in pipelines, pools, process equipment, and vessels. The PMN substance is intended for use in applications involving sour gas streams which have high levels of hydrogen sulfide. STN file CA: no references found.

I. Test Data Submitted:

J. MSDS:

MSDS: Yes

Label: No

General equipment: for long term exposure: fluorinated rubber gloves (480 min breakthrough, 0.7 mm thickness); for short-term exposure: nitrile rubber gloves (30 min breakthrough, 0.4 mm thickness). / wear sufficient eye protection (safety glasses with side protection or goggles, and if necessary, face shield) / protective clothing.

Respirator: Use respiratory protection in case of insufficient exhaust ventilation or prolonged exposure.

Health Effects: Harmful if swallowed / causes skin irritation / causes serious eye damage.

K. SAT Ratings:

Human Health:

1-2 ;

Environment:

3 ;

L. Focus Results:

P-14-0534 will be regulated under the TSCA 5(e) category ( ) Ban Pending-Up Front Testing under the risk and exposure-based authority for ecotoxicity and fate concerns. Not absorbed from the skin, for the low molecular weight fractions ( ) expect poor absorption from the GI tract and moderate absorption from the lung (pchem). Human health hazard concerns were low-moderate for effects on the lung; irritation to eye, mucous membranes and lung based on properties of the compounds. Workers are expected to be exposed via the dermal and inhalation routes. Potential risks to workers were mitigated by negligible inhalation exposures and appropriate dermal PPE. The engineer recommended amending the SDS to include a NIOSH-certified respirator, however

due to negligible inhalation exposures the change was not required. Ecotoxicity hazard concerns were high based on SAR nearest analog predictions for [REDACTED]. Chronic risks to the environment were high due to releases to water where the chronic COC of 1 ppb was exceeded 50 [REDACTED] days [REDACTED] ) and 250 [REDACTED] days [REDACTED] during processing and use operations. Acute risks to the environment were high due to releases to water where the SWCs of [REDACTED] [REDACTED] during processing and use operations exceeded the acute COC of 26 ppb. The acute and chronic mixing zone concentrations of [REDACTED] [REDACTED], respectively, also exceeded the concern concentrations. The program manager will clarify with the submitter if this PMN will be used in marine water, freshwater or both. The testing will be finalized once the clarification is made. The required ecotoxicity testing for marine water use will be the Fish acute toxicity test, freshwater and marine test (OPPTS Test Guideline 850.1075), and the Mysid acute toxicity test (OPPTS Test Guideline 850.1035). If the PMN is used in both marine and freshwater the required ecotoxicity testing will be the acute base set: Freshwater daphnids (OPPTS Test Guideline 850.1010), Fish acute toxicity test (OPPTS Test Guideline 850.1075), and the Algal toxicity test (OCSPP Test Guideline 850.4500), as well as the Fish acute toxicity test, freshwater and marine test (OPPTS Test Guideline 850.1075) and the Mysid acute toxicity test (OPPTS Test Guideline 850.1035). The fate testing is to be determined. No human health testing was desired. [REDACTED]

COC: Chronic – 1 ppb, Acute – 26 ppb

#### Summary of Exposures and Releases

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **Part II: New Information**

Based on information in a Sept. 10 2014 letter, the IRER was revised with the following changes: (1) Processing: (a) a [REDACTED] g site (b) assessment of release of [REDACTED] is consistent with submitter letter, and (c) release due to [REDACTED] is eliminated. (2) Use: assessment of uses is made for 2 cases, each at 100% of PV: (a) submitter claim of use restricted to on-shore and (b) a "what-if" use on-shore and off-shore. The basis for the "what-if" case is that corrosion resistance chemicals are used to protect metallic components from acidic compounds used in oil production (in general) according to the GS, which indicates that the use of corrosion-resistance chemicals is not restricted to the production of sour oil and gas.

## **Part III: Recommendation and Rationale**

Modeling indicates there is potential for exceedance of the ecotox CoC from releases from [REDACTED] or [REDACTED] during processing (formulation of oil well additive), and from releases [REDACTED]. The Generic Scenario estimates nationally only 1% send produced water to POTWs, but a reasonable worst case would be risk at a particular site. Therefore, based on potential for exceedances during processing and use, and XB criteria being met, the program manager recommends offering a consent order to the PMN submitter, which would restrict use to on-shore use, water trigger for surface water releases, and triggering of ecotox/fate testing identified at the Focus meeting.

## **Part IV: Risk Summary**

### **A. Health Effects:**

Not absorbed from the skin, for the low molecular weight fractions [REDACTED] expect poor absorption from the GI tract and moderate absorption from the lung (pchem). Concern for [REDACTED] effects on the lung; irritation to eye, mucous membranes and lung based on [REDACTED] properties of the compounds.

### **B. Environmental Effects:**

Ecotox: predicted (P) and measured (M) toxicity value is mg/L (ppm) are:

Fish 96-h LC50:	49(P)	
Daphnid 48-h LC50:	0.13(P)	
Green algal 96-h EC50:	0.68(P)	0.23(M)
Fish Chronic Value:	0.013(P)	
Daphnid ChV:	0.068(P)	
Algal ChV:	0.45(P)	0.18(M)

### **C. Environmental Releases and Exposures:**

### **D. Risk Estimates:**

## Part V: Exposure Criteria Met

Exposure Based Review (Chemistry): ☒ Yes ☐ No

Exposure Based Review (Health): ☐ Yes ☒ No

Exposure Based Review (Ecotox): ☒ Yes ☐ No

Exposure Based Review (Occupational): ☒ Yes ☐ No

Exposure Based Review (Non-Occupational): ☐ Yes ☒ No

Exposure Based Review (Environmental): ☐ Yes ☐ No

Exposure Based Review Criteria--Engineering Report			Amt
1. Number of Workers Exposed > 1000?	Yes		
3b. > 250 Workers With Routine Dermal Contact > 100 Days/Yr	Yes		
Exposure Parameter	Exposure-Based	Persistent/Bioaccum	Exposure Value
Water Releases:	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	
Total Releases:	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	

## Part VI: Tests

Final Testing Recommendation

Health:

Eco:

Fate:

Other:

Comments:

## Part VII: Other Factors

A. Substitutes:

B. Benefits:

C. Other Uses:

D. Other:

## Part VIII: Regulatory History

☒ - DENIED  
☐ - GRANTED  
☐ - WITHDRAWN - OTHER  
☐ - FOCUS DROP  
☐ - SR MID-COURSE DISP DROP

Comments:


● Last Updated by

Document Created by Ken Moss on 11/12/2014

# PMN Summary

<b>Case Number:</b>	<b>P-14-0534</b>	<b>Day in Process:</b> 90	<b>Total Days:</b> 314
<b>Consolidated Cases</b>	No	<b>PMN Summary Only?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>PMN Day 1:</b>	04/29/2014	<b>Original PMN Day 90:</b>	07/27/2014
<b>Total Days Suspended:</b>	124	<b>PMN Day 90 (30,45,60):</b>	11/28/2014

Phase	Status	Decision
Post Focus	Archive	PMN Ban Pending Upfront Testing Suspended on day 90 through 11/27/2014 (124 Days) Decision Date: 11/13/2014 Decision Type: Decision History: CRSS Decision of Move Forward made on 05/08/2014 Focus Decision of PMN Delay made on 05/15/2014 Focus Decision of PMN Ban Pending Upfront Testing made on 05/19/2014

Date 	Final Disposition
Disposition History:	WITHOTH Withdrawn in the face of Voluntary Testing plus all other reasons on 11/20/2014
CRSS Descriptors:	YX-Exposure-Based 5(e)
Additional Descriptor:	
Withdrawn Date:	

CRSS Date:	05/08/2014
SAT Date:	05/09/2014
Focus Date:	05/19/2014

**Document Type:** Premanufacture Notice (PMN)

**Case Number:** P-14-0534

**Day(1):** 04-29-2014

**Document Processing Comments:** SRN: COFS140429345689103

**Submission File Name:** [formdata.pdf](#)

**Attachments(s)**

- **Name:** [Attachment-5-COFS05-CBI.pdf](#) - Worker/Occupational Exposure New Chemical Substance at Industrial Sites
- **Name:** [Attachment-11-COFS05-CBI.pdf](#) - Environmental Effects Data on Substance - Algae Test
- **Name:** [Attachment-3-COFS05-CBI.pdf](#) - CAS Inventory Expert Service on Structure
- **Name:** [Attachment-6-COFS05-CBI.pdf](#) - Environmental Release and Data on the New Chemical Substance at Industrial
- **Name:** [Attachment-10-COFS05-CBI.pdf](#) - Environmental Fate Data on Substance - Biodegradation Test
- **Name:** [Attachment-1-COFS05-CBI.pdf](#) - Material Safety Data Sheet
- **Name:** [Attachment-9-COFS05-CBI.pdf](#) - Physical and Chemical Properties of Chemical Substance - Molecular Weight

		<ul style="list-style-type: none"> <li>● <b>Name:</b> <a href="#">Attachment-8-COFS05-CBI.pdf</a> - Worker/Occupational Exposure Release Information on the New</li> <li>● <b>Name:</b> <a href="#">Attachment-4-COFS05-CBI.pdf</a> - Processing Information on the Substance at Industrial Sites Controlled by the</li> <li>● <b>Name:</b> <a href="#">Attachment-7-COFS05-CBI.pdf</a> - End Use Information on the Substance at Industrial Sites Controlled by</li> <li>● <b>Name:</b> <a href="#">Attachment-2-COFS05-CBI.pdf</a> - Summary of Information on the Substance</li> </ul>
--	--	---

Chemist:	Darling, D.	Engineer:	El-Zoobi
SAT Chair:	L Keifer 564-8916	Exposure Specialist:	Bevington/EN
Focus Chair:	Kristan Markey	Contractor Support:	<input checked="" type="radio"/> Yes <input type="radio"/> No

#### PMN Attributes

Chemical Name:			
Submitter:		Trade Name:	
Contact:		Contact Telephone Number:	
Manufacturer:		Import:	X
Polymer:	<input type="radio"/> Yes <input checked="" type="radio"/> No	Grouping for CRSS:	
		Grouping for Focus:	
Production Volume:		Binding Option:	No
ES Order No.:		CAS Number:	
Uses:	The PMN substance will be used in the oil and gas industry as a corrosion inhibitor additive to prevent internal corrosion in pipelines, pools, process equipment, and vessels. The PMN substance is intended for use in applications involving sour gas streams which have high levels of hydrogen sulfide. STN file CA: no references found.		

#### Ratings and Concern Levels:

	Health Ratings	Eco Ratings	Comments
(1)	1-2	3	;

Occupational Exposure:	1C
Non-Occupational Exposure:	1
Environmental Exposure:	3
Engineering Drop Criteria/Exposure Drop:	/

Persistence	Bioaccumulation	Toxicity	PBT Comments
(1) 2	(1) 1	(1) 1	(1)

#### Exposure Based Information



Exposure Based Review (Chemistry): ☒ Yes ☐ No

Exposure Based Review (Ecotox): ☒ Yes ☐ No

Exposure Based Review (Non-Occupational): ☐ Yes ☐ No

Exposure Based Review (Health): ☐ Yes ☒ No

Exposure Based Review (Occupational): ☒ Yes ☐ No

Exposure Based Review (Environmental): ☒ Yes ☐ No

Criteria		Criteria	
1. Number of Workers Exposed > 1000?	<input type="radio"/> Yes <input type="radio"/> No	1. Exposure-Based Fate--Surface Drinking Water?	<input type="radio"/> Yes <input checked="" type="radio"/> No
2. > 100 Workers With > 10 mg/Day Inhalation Exposure	<input type="radio"/> Yes <input type="radio"/> No	2. Fish Ingestion:	<input type="radio"/> Yes <input checked="" type="radio"/> No
3a. > 100 Workers With 1-10 mg/Day Inhalation Exposure >100 Days/Yr	<input type="radio"/> Yes <input type="radio"/> No	3. Exposure-Based Fate--Ground Drinking Water?	<input type="radio"/> Yes <input checked="" type="radio"/> No
3b. > 250 Workers With Routine Dermal Contact > 100 Days/Yr	<input type="radio"/> Yes <input type="radio"/> No	4. Exposure-Based Fate--Inhalation?	<input type="radio"/> Yes <input checked="" type="radio"/> No
		5. Exposure-Based Fate--Water Releases?	<input checked="" type="radio"/> Yes <input type="radio"/> No
		6. Total Releases:	<input checked="" type="radio"/> Yes <input type="radio"/> No
		7. Consumer Exposure:	<input type="radio"/> Yes <input checked="" type="radio"/> No

#### Post Focus Agenda Information

Meeting	Meeting Date	Time	Location	Issue	Proposed Decision
CCD Dispo:			5140		
Division Director's:			4140		

#### Program Manager/Technical Integrator

No.	Assignment	Branch	Resource	Phone	Date Assigned
01.	Program Manager	CCD/NCNMB	Kristan Markey	(202) 564-8716	05/20/2014

#### Workgroup Assignments

No.	Assignment	Branch	Resource	Phone	Date Assigned

#### SNUR History:

Federal Register Number ; Federal Registry Date ; Reason ; Federal Registry Citation

#### SNUR Citations:

Sanitization Due Date: ; SNUR notification to reviewers: ; Generic name: ☐ Yes ☐ No

Batch identifier:

CEB Rep: Eric Jackson	EAB Rep:	ICB Rep: Jasbir Sarna	RAD Rep:

Done: ☐ Yes  
☐ No

Done: ☐ Yes  
☐ No

Done: ☐ Yes  
☐ No

Done: ☐ Yes  
☐ No

---

**Notice of Commencement:**

Has the case been NOC'd? ☐ Yes ☐ No

---

**Status History:**

5/1/2014 3:51:49 PM -- Phase Initial Review -- kathryn schechter

5/1/2014 3:51:49 PM -- Status Pending CRSS -- kathryn schechter

5/5/2014 2:12:35 PM -- Status changed from Pending CRSS to Scheduled for CRSS -- kathryn schechter

5/8/2014 3:57:52 PM -- Status changed from Pending CRSS to Pending Focus -- Justin Roberts

5/8/2014 3:57:52 PM -- Decision changed from to FWD-Move Forward -- Justin Roberts

5/12/2014 9:07:09 AM -- Status changed from Pending Focus to Scheduled for Focus -- Eric Jackson

5/14/2014 4:02:42 PM -- Status changed from Pending Focus to Scheduled for Focus -- Bethzaida Colon

5/15/2014 8:57:09 AM -- Decision changed from FWD-Move Forward to PMN Delay -- Eric Jackson

5/15/2014 10:00:24 AM -- Decision changed from PMN Delay to FWD-Move Forward -- kathryn schechter

5/15/2014 10:00:57 AM -- Status changed from Scheduled for Focus to Pending Focus -- kathryn schechter

5/15/2014 10:01:32 AM -- Status changed from Pending Focus to Scheduled for Focus -- kathryn schechter

5/15/2014 10:01:56 AM -- Decision changed from FWD-Move Forward to PMN Delay -- kathryn schechter

5/19/2014 1:03:23 PM -- Phase changed from Initial Review to Post Focus -- Olga Svetlitskaya

5/19/2014 1:03:23 PM -- Status changed from Scheduled for Focus to Ban Pending Testing -- Olga Svetlitskaya

5/19/2014 1:03:23 PM -- Decision changed from PMN Delay to PMN Ban Pending Upfront Testing -- Olga Svetlitskaya

11/13/2014 2:17:24 PM -- Case suspended for 124 day(s) on 7/27/2014 -- Greg Schweer

---

**New Status History Comments :**

---

**General Comments:**

11/12/2014 10:12:20 AM -- Verbal suspension to 11/28/14. Eager for decision. Non 5(e) SNUR "land use only" would be appropriate according to the PMN submitter. [REDACTED]  
-- Ken Moss

---

**PMN Summary Comments :**

---

Last Updated by Kristan Markey on 11/20/2014 at 03:06:49 PM

Document Created by kathryn schechter on 05/01/2014

